

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

PHILIP J. CHARVAT,	:	
on behalf of himself and others	:	Case No. 16-cv-00120
similarly situated,	:	
	:	
Plaintiff,	:	Judge James L. Graham
v.	:	
	:	Magistrate Judge Kimberly A. Jolson
SHAMPAN LAMPORT, LLC,	:	
	:	
Defendant.	:	

MOTION FOR EXTENSION OF TIME TO MOVE OR PLEAD

Now comes defendant, Shampan Lamport, LLC, pursuant to S.D. Ohio, L. R. 6.1, to respectfully request the entry of an Order which grants it an additional twenty one (21) days, to and including April 15, 2016, in which to move or plead in response to the allegations of Plaintiff's complaint. This motion is not being interposed for purposes of delay, and Defendant seeks additional time to move or plead in order 1) to complete the retention of undersigned local counsel; 2) for its other attorneys complete applications for admission *pro hac vice*, and 3) to properly complete their investigation into this matter in accordance with the rules of professional responsibility, prior to having their attorneys interpose an answer or motion on behalf of Defendant.

Defendant Shampon Lamport, LLC has previously availed itself of one stipulated extension of time to answer or otherwise move or plead to Plaintiff's Complaint. Notwithstanding, counsel for Plaintiff has kindly indicated that he will not oppose such an extension of time.

Respectfully submitted,

/s Michael D. Dortch

Michael Dortch, Esq.

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as counsel for Shampian Lamport, LLC and

local counsel for

Timothy Feil, Esq.

Craig Riha, Esq.

Pro Hac Vice application to follow

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CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2016 an exact copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served this same date, by regular US Mail. Parties may access this filing through the Court's system.

/s/ Michael D. Dortch